

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Costing Treatment of :
Retirement Debt Removal : Docket No. RM2023-1

PETITION FOR RECONSIDERATION AND INITIATION OF PROCEEDING

The Greeting Card Association (GCA) hereby respectfully petitions the Commission –

1. To reconsider the position expressed in the Secretary’s letter of October 7, 2022, to Mr. Richard Cooper of the United States Postal Service, purporting to convey approval of the Postal Service’s proposed costing treatment of the removal of approximately \$57 billion in retirement liabilities, effected by the USPS Fairness Act of 2022; and

2. To institute a proceeding pursuant to 39 CFR Part 3050 (particularly section 3050.11) to consider, with the benefit of the required comments from interested parties, whether to accept, change, or reject the Postal Service’s proposed costing treatment.

The Postal Service’s proposed treatment is clearly a change in analytical principles, and as such is required to be assessed and decided upon in a rulemaking docket, conforming to 5 U.S.C. sec. 553, eventuating in a Commission order. We believe that a letter from the Secretary, with no opportunity for prior public comment, cannot substitute for such a proceeding and Commission order.

This Petition is filed since the Secretary's letter evidently did not amount to establishment of a rulemaking docket (which we believe is mandatory); it represents our request that such a docket be established.

The substantive and procedural arguments were set forth at length in the letter to the Secretary of interested parties including GCA. We respectfully request that this letter be incorporated in full in the present petition. That letter also presented a request for reconsideration of the position expressed in the Secretary's October 7 letter.

November 4, 2022

Respectfully submitted,

GREETING CARD ASSOCIATION

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